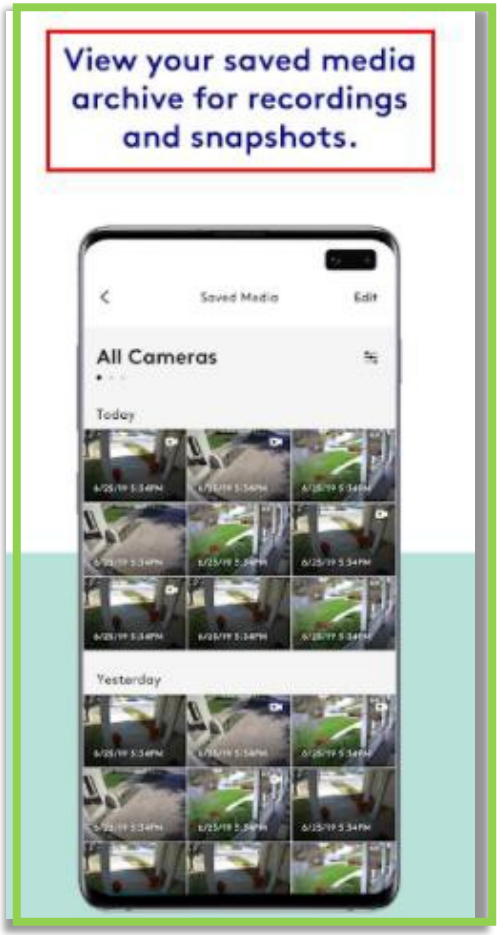
EXHIBIT B

Infringement Claim Chart for U.S. Pat. No. 8,856,221 vs. ADT Inc. ("Defendant")

Claims 7	Evidences
7) A method for storing media content and delivering requested media content to a consumer device, the method comprising:	The defendant's (ADT Inc.) product Blue by ADT cloud-based IP security camera practices a method of storing (e.g. cloud storage) media content (e.g. recorded videos etc.) and delivering requested media content to a consumer device.  Source: https://play.google.com/store/apps/details?id=com.lifeshield.phone&hl=en_IN&gl=US Source: https://www.bluebyadt.com/shop/blue-outdoor-camera.html

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Source: https://www.bluebyadt.com/promotional-terms/

ADT's cloud-based solutions are ideal for small business owners whom, for example, are in an office suite environment where security needs may be addressed by building management. These customers could benefit from added visibility with minimal IT support required and a significantly lower up-front cost with Broadband-enabled cameras. The new cloud solutions can also help increase audit capabilities with motion-triggered video storage and alerts, as well as archived video playback for incident investigations.

Source: https://news.adt.com/news-releases/news-release-details/adt-unveils-new-cloud-storage-solutions-expands-video/

Additionally, the new solution provides greater insight into daily business activities through cloud-based video surveillance from any web-enabled device. The seamless user interface has an advanced search functionality to provide live video views or recorded video in one centrally managed account. With multiple options to choose from, small business owners have control over their investment level with 15 or 30 days video storage options.

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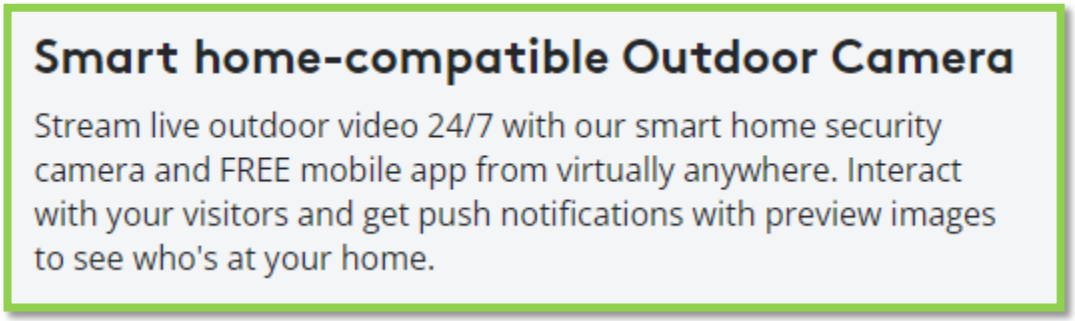

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a) receiving a request message including media data indicating requested media content and a consumer device identifier corresponding to the consumer device;	The Blue cloud-based IP security camera necessarily includes a receiver configured to receive a request message including data indicating requested media content (e.g. the Blue cloud-based IP security camera must have the infrastructure to receive a request to store recorded media content or to stream recorded media content on a smartphone; additionally, the request message must contain data that identifies the content to be stored or streamed) and a consumer device identifier corresponding to a consumer device (e.g., the user credentials are used to access the contents of the Blue cloud-based IP security camera). Once powered and connected to WiFi, your ADT wireless camera will send audio and video signals to your phone or cloud storage. What makes ADT special is its integration with the ADT mobile app. You can view footage from any location and watch clips in real-time or save them for later. The ADT app offers a simple user interface. You can access footage at any time, even if you're not at home. You can control your security camera system even on-the-go to see who's at your door. Source: https://www.adt.com/resources/how-do-security-cameras-work **Smart home-compatible Outdoor Camera** Stream live outdoor video 24/7 with our smart home security camera and FREE mobile app from virtually anywhere. Interact with your visitors and get push notifications with preview images to see who's at your home. Source: https://www.bluebyadt.com/shop/blue-outdoor-camera.html

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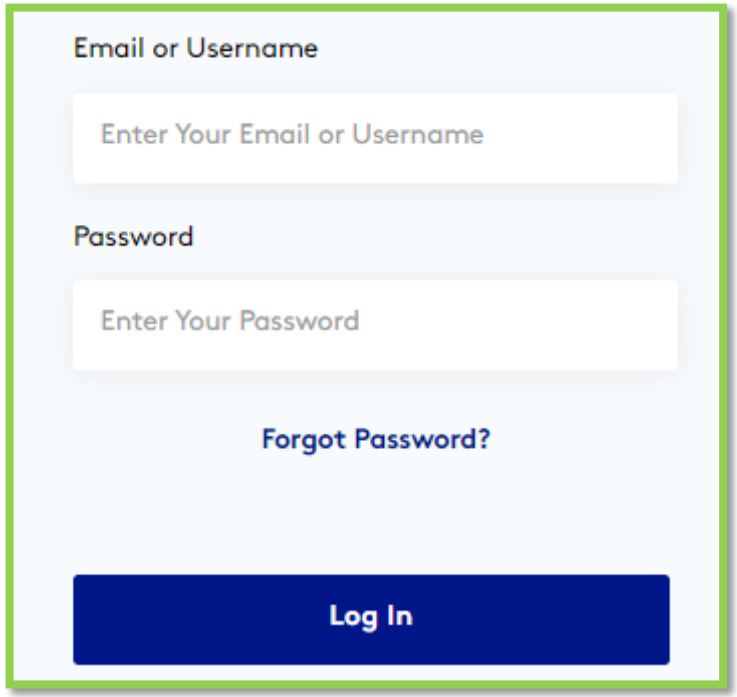
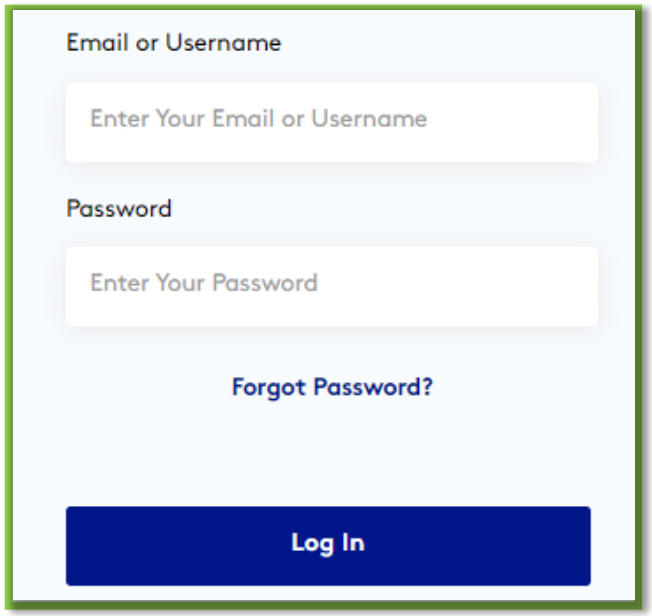
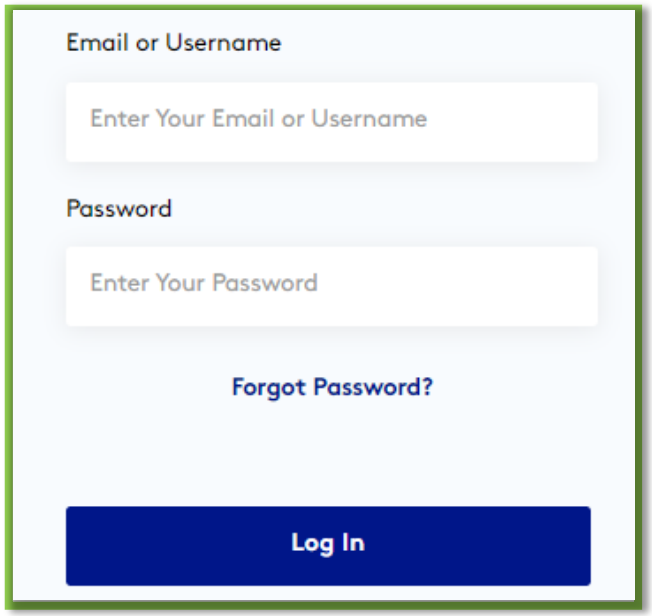
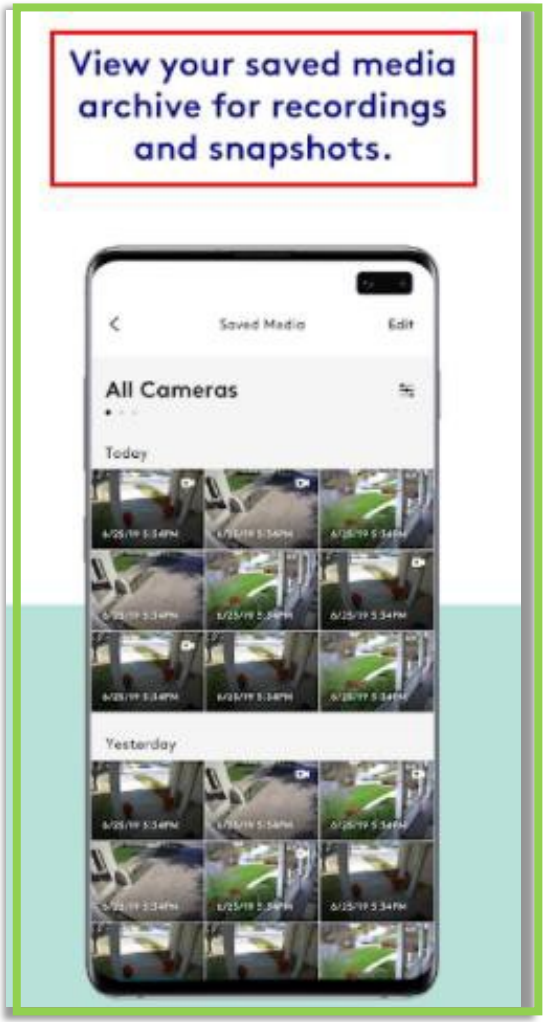


Source: https://login.bluebyadt.com/#/login

b)determining whether the consumer device identifier corresponds to a registered consumer device; and	The defendant's Product necessarily determines whether the consumer device identifier corresponds to the registered consumer device (e.g., a user must be a registered user to access Blue cloud-based IP security camera services). Source: https://www.bluebyadt.com/help/  Source: https://login.bluebyadt.com/#/login

c) if it is determined that the consumer device identifier corresponds to the registered consumer device, then:	The defendant's Product necessarily determines whether the consumer device identifier corresponds to the registered consumer device (e.g., a user must be a registered user to access Blue cloud-based IP security camera). Source: https://www.bluebyadt.com/help/  Source: https://login.bluebyadt.com/#/login

d)determining, whether the request message is one of a storage request message and a content request message; and	The Product provides for both media downloads and/or storage, and media streaming. As per the information available, after successful login, it necessarily determines whether the request received from a customer is a request for storage (e.g., recording or storing content) or content (e.g., streaming of media content).  Source: https://play.google.com/store/apps/details?id=com.lifeshield.phone&hl=en_IN&gl=US Source: https://www.bluebyadt.com/shop/blue-outdoor-camera.html

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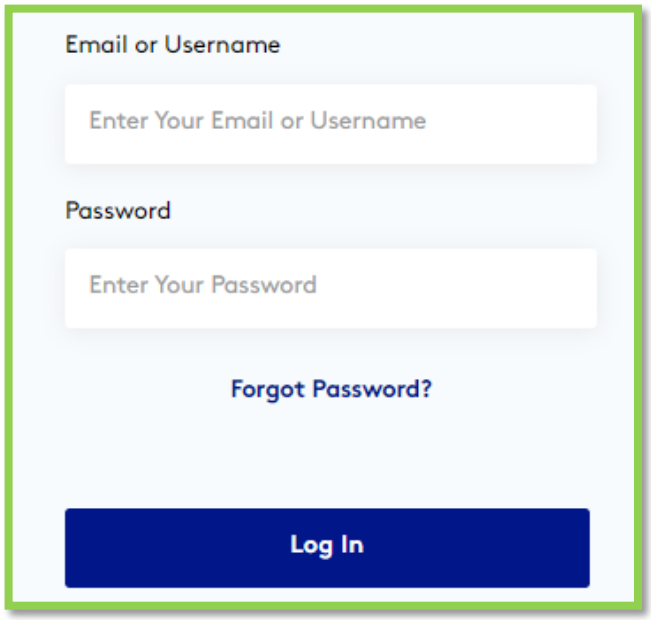

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e) if the request message is the storage request message, then determining whether the requested media content is available for storage; and	The product verifies that media content identified in the media data of the storage request message (e.g., request to record content) is available for storage to prevent data errors that would result from attempting to store content that is not available for storage. It must verify that the media content (e.g. specific recording) identified in the media data of the storage request message is available for storage to prevent data errors that would result from attempting to store content that is not available for storage (e.g. the product must verify a user's ability to store video is limited to a certain amount of memory usage based upon their subscription, thus media content may not be available for storage if a user is already above their memory limit or if he hasn't subscribed to any service). Once powered and connected to WiFi, your ADT wireless camera will send audio and video signals to your phone or cloud storage. What makes ADT special is its integration with the ADT mobile app. You can view footage from any location and watch clips in real-time or save them for later. The ADT app offers a simple user interface. You can access footage at any time, even if you're not at home. You can control your security camera system even on-the-go to see who's at your door. Source: https://www.adt.com/resources/how-do-security-cameras-work **Smart home-compatible Outdoor Camera** Stream live outdoor video 24/7 with our smart home security camera and FREE mobile app from virtually anywhere. Interact with your visitors and get push notifications with preview images to see who's at your home. Source: https://www.bluebyadt.com/shop/blue-outdoor-camera.html

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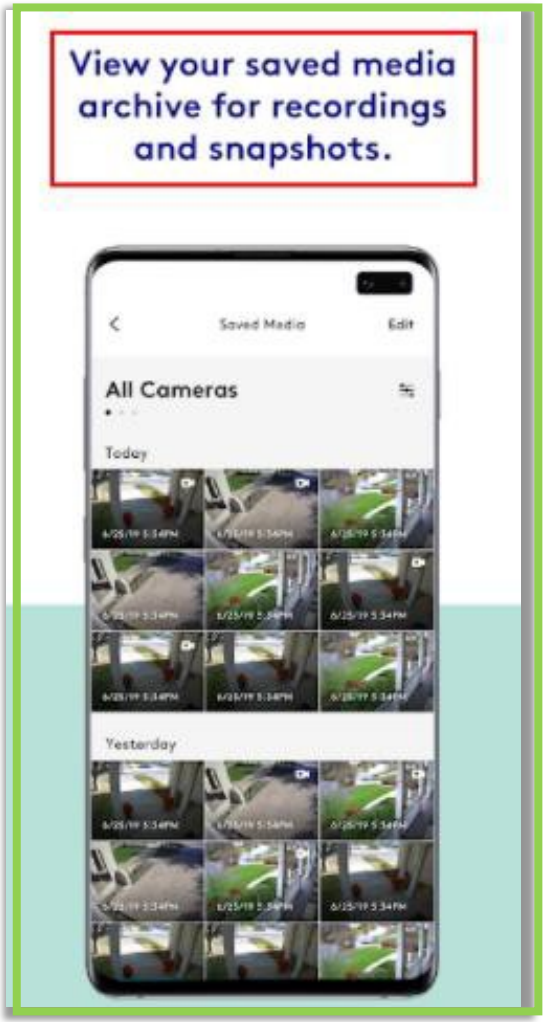
f) if the request message is the content request message, then initiating delivery of the requested media content to the consumer device;	If a customer requests content (e.g., streaming of media content), then the product necessarily initiates delivery of the content to the customer's device. It will initiate delivery of the requested media content to the consumer device (e.g. streaming of media content feed to a smartphone or tablet etc.).  Source: https://play.google.com/store/apps/details?id=com.lifeshield.phone&hl=en_IN&gl=US Source: https://www.bluebyadt.com/shop/blue-outdoor-camera.html

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The ADT app offers a simple user interface. You can access footage at any time, even if you're not at home. You can control your security camera system even on-the-go to see who's at your door.

Source: https://www.adt.com/resources/how-do-security-cameras-work

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g) wherein the media data includes time data that indicates a length of time to store the requested media content; and	The media data includes time data that indicates a length of time to store the requested media content (e.g. a user is allowed to store media content for a retention period time as per their subscription level, which varies from 15 to 30 days in the cloud). **Video Storage Service** If you purchase a camera product, you receive free camera storage for 30 days. At the end of your 30-day trial you may renew your camera storage option and be billed monthly. Failure to renew at the end of the trial period will result in the termination of camera storage and the loss of media stored through ADT, older than 24 hours. Monthly video storage pricing is $6.00 +tax and includes 30 days of video storage for all cameras per location. You can cancel video storage service at any time by going to login.bluebyadt.com. Source: https://www.bluebyadt.com/promotional-terms/ Additionally, the new solution provides greater insight into daily business activities through cloud-based video surveillance from any web-enabled device. The seamless user interface has an advanced search functionality to provide live video views or recorded video in one centrally managed account. With multiple options to choose from, small business owners have control over their investment level with 15 or 30 days video storage options. Source: https://news.adt.com/news-releases/news-release-details/adt-unveils-new-cloud-storage-solutions-expands-video/

h) the first processor is further configured to determine whether the requested media content exists; and	The product must determine whether the requested media content exists before initiating delivery to prevent data errors that would result from attempting to transmit media content that does not exist (e.g. the product must verify that a particular requested data is stored in the cloud). ADT's cloud-based solutions are ideal for small business owners whom, for example, are in an office suite environment where security needs may be addressed by building management. These customers could benefit from added visibility with minimal IT support required and a significantly lower up-front cost with Broadband-enabled cameras. The new cloud solutions can also help increase audit capabilities with motion-triggered video storage and alerts, as well as archived video playback for incident investigations. Source: https://news.adt.com/news-releases/news-release-details/adt-unveils-new-cloud-storage-solutions-expands-video/ Additionally, the new solution provides greater insight into daily business activities through cloud-based video surveillance from any web-enabled device. The seamless user interface has an advanced search functionality to provide live video views or recorded video in one centrally managed account. With multiple options to choose from, small business owners have control over their investment level with 15 or 30 days video storage options. Source: https://news.adt.com/news-releases/news-release-details/adt-unveils-new-cloud-storage-solutions-expands-video/

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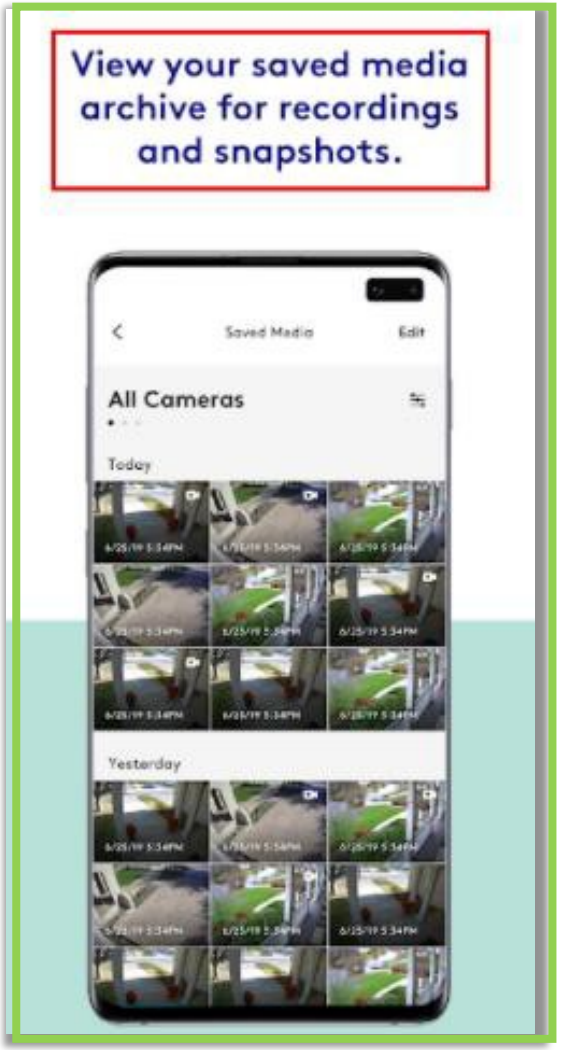
Source: https://www.youtube.com/watch?v=dMfQvmaGFw0

l) if the processor determines that the requested media content exists, the processor is further configured to determine whether the requested media content is available and whether there are restrictions associated with the requested media content that prevent the requested media content from being delivered to the consumer device.	After the processor determines if the requested media content is available, then it determines whether there are any restrictions associated with the requested media content (e.g., subscription level, etc).  Source: https://play.google.com/store/apps/details?id=com.lifeshield.phone&hl=en_IN&gl=US Source: https://www.bluebyadt.com/shop/blue-outdoor-camera.html

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